



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 7, 2023

MEMO ENDORSED
7/10/23

By ECF

The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

CASE Adjourned to
Oct 12, 2023 at 2:15 pm.
Time Excluded in the interest
of justice, to allow
for the review of discovery
and plea discussions.

Re: United States v. Takeshi Ebisawa, et al., 22 Cr. 256 (CM)

Dear Judge McMahon:

The Government writes to respectfully request that the status conference scheduled for July 13, 2023 at 2:00 p.m. be adjourned for approximately 90 days and that Speedy Trial time be excluded until the next conference date. All defendants, through counsel, consent to this request.

The Government recently received returns from a mutual legal treaty request to Japan. These returns consist of approximately 800 pages of paper records, which appear to be largely in Japanese, as well as extractions of six electronic devices. The parties anticipate that the review of these materials will take some time. A 90-day adjournment will facilitate the parties' review of these returns and their continued discussions regarding any pretrial resolution to the case. Exclusion of Speedy Trial time would serve the same ends.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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Cc: Counsel of record (by ECF)

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